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**Subject:** Prop 65 in Label Review Manual  
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Hi Mike. Specific to Prop 65 in the LRM, I was only able to find language related to precautionary language:

*Because of the potential for confusion, the Agency historically has not approved labels containing the terms "caution", "warning", or "danger", except as the Signal Word for that label (e.g., "CAUTION: Wash hands before eating, or smoking" on a label with the signal of "Caution"). If the Prop 65 term conflicts with the EPA signal word, then registrants should use "Notice" or "Attention" for the Prop 65 statement so that it does not conflict with the EPA signal word. . However, registrants should use the term "notice" or "attention" instead, so that it does not conflict with the EPA required Signal Word.*

There was also this in the inert chapter, but it doesn't specifically mention Prop 65:

***Listing of Inert/Other Ingredients***

*Inert ingredients are not required to be identified individually in the ingredient statement except when EPA determines that such inert ingredient may pose a hazard to man or the environment. See [40 CFR 156.10\(g\) \(7\)](#). In such a situation, EPA may require that the name of the inert be listed in the ingredient statement. However, if a registrant wants to list a particular inert ingredient in the ingredient statement, the registrant should list **all** inert ingredients directly below the ingredient statement in descending order by weight. A partial listing on the label could be misleading.*

*Registrants are encouraged to disclose on the label the inert/other ingredients in their pesticide product either by chemical name or functional category with a brief explanatory definition. For example,*

*Other Ingredients 92.8%  
monochlorobenzene, glycerin, 8-hydroxyquinoline sulfate and  
dimethylpolysiloxane  
Other Ingredients 92.8%  
Diluent, emulsifier, defoamer, preservatives and stabilizer*

I left a message for Hope to see if she knows any more references, since she has a history with this. I'll let you know what I hear.

Thanks,

Dan K.

Daniel Kenny

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